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R# 651651UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Civil No. 07 CIV 4853

RICO FERRO and ANGELINA S. FERRO,

Plaintiffs,

- against -

SHUTTLE AMERICA CORPORATION,
d/b/a UNITED EXPRESS, and
REPUBLIC AIRWAYS HOLDINGS INC.,

Defendants.

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**DEFENDANTS' MOTION
REQUESTING *PRO HAC VICE*
ADMISSION OF NICHOLAS C.
BART AND JOHN G. McAULEY**FILED
U.S. DISTRICT COURT
S.D. OF N.Y. W.P.
2008 AUG 15 AM 11:01

PLEASE TAKE NOTICE, pursuant to Rule 1.3(c) of the Rules of the United States District Courts for the Southern and Eastern Districts of New York ("Local Rules"), and upon the annexed Affidavits of Paul A. Lange, Defendants, SHUTTLE AMERICA CORPORATION and REPUBLIC AIRWAYS HOLDINGS INC., hereby move this Court at the Courthouse located at 500 Pearl Street, New York, New York for an Order admitting Nicholas C. Bart and John G. McAuley to practice *pro hac vice* in this action.

In support thereof, the undersigned Defendants set forth the following:

1. Nicholas C. Bart and John G. McAuley are associated with the law firm of ADLER MURPHY & McQUILLEN LLP, whose business address is One North LaSalle Street, Suite 2300, Chicago, Illinois. Prior counsel, Kevin W. Murphy, has terminated his association with that firm.

2. Nicholas C. Bart and John G. McAuley have been retained by Defendants, SHUTTLE AMERICA CORPORATION and REPUBLIC AIRWAYS HOLDINGS INC., in the instant matter, and have had a relationship with Defendants for an extended period of time.

3. Defendants, SHUTTLE AMERICA CORPORATION and REPUBLIC AIRWAYS HOLDINGS INC., wish to be represented by Nicholas C. Bart and John G. McAuley in lieu of Kevin W. Murphy.

4. Attorneys Nicholas C. Bart and John G. McAuley are associated in the preparation and trial of the above-captioned case with the Law Office of Paul A. Lange located at 445 Park Avenue, 9th floor, New York, New York.

5. Nicholas C. Bart is an attorney licensed to practice law in the States of Illinois and Wisconsin. He has been admitted to practice before the United States District Courts for the Northern, Central, and Southern Districts of Illinois and the United States Court of Appeals for the Third Circuit and Seventh Circuits.

6. John G. McAuley is an attorney licensed to practice law in the State of Illinois. He has been admitted to practice before the United States District Court, Northern District of Illinois.

7. Nicholas C. Bart and John G. McAuley are members in good standing and are eligible to practice in all of the above-stated courts. They are not currently, nor have they ever been suspended, disciplined or disbarred. There are not now, nor have there been, any grievances or criminal matters pending against Nicholas C. Bart or John G. McAuley.

8. Neither Nicholas C. Bart nor John G. McAuley has ever been denied admission to any state or federal court.

WHEREFORE, the undersigned Defendants respectfully request that the Court grant this Motion and permit Nicholas C. Bart and John G. McAuley to be admitted to practice *pro hac vice* herein in lieu of Kevin W. Murphy.

Dated: August 15, 2008

SHUTTLE AMERICA CORPORATION
and REPUBLIC AIRWAYS HOLDINGS
INC.

By: 

Paul A. Lange PL2078
Law Offices of Paul A. Lange, LLC
445 Park Avenue, 9th floor
New York, NY 10022-8632
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ORDER

Defendants, SHUTTLE AMERICA CORPORATION and REPUBLIC AIRWAYS HOLDINGS INC.'s Motion requesting the *pro hac vice* admission of _____, 2008, having been heard by the Court is hereby ordered:

GRANTED / DENIED

BY THE COURT,

Judge/Clerk

Dated: _____, 2008